

NO. NHH-CV19-5003875

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SUPERIOR COURT/
HOUSING SESSION

NYRIEL SMITH, ET AL.,
V.

:
:

J.D OF NEW HAVEN

CITY OF NEW HAVEN, ET AL.,

:

SEPTEMBER 26, 2019

**DEFENDANTS' MOTION FOR EXTENSION OF TO RESPOND TO PLAINTIFF'S
INTERROGATORIES AND PRODUCTION REQUESTS**

Pursuant to Practice Book Sections 13-7(a)(2) and 13-10(a)(2), the defendants move for an extension of time of thirty (30) days, up to and including October 31, 2019, within which to respond and object to plaintiff's discovery requests dated August 2, 2019.

The additional time is needed because of the nature of certain of the interrogatories, the volume of some of the materials requested, the need to review some of the answers provided to certain of the requested interrogatories and production materials for confidentiality and privilege reasons, and the difficulty in readily obtaining some of the requested materials and answers. Counsel is in the process of either obtaining the information to comply with the Interrogatories and Requests for Production promulgated by the plaintiff or is in the process of determining what the appropriate response or objection should be to certain of the discovery requests. The extension of time is also requested in order to afford the undersigned the opportunity to adequately address the items contained within said Interrogatories and Requests for Production.

The defendants certify that this matter has not been assigned for trial.

THE DEFENDANTS,
CITY OF NEW HAVEN
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& PAUL KOWALSKI

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CERTIFICATION

This is to certify that a copy of the foregoing was e-mailed and mailed, postage prepaid, on September 26, 2019 to the following counsel of record:

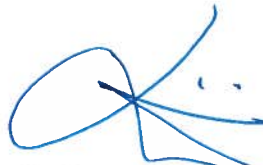
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